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ATTORNEYS FOR JOSEPH DUANE FOLKERTS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,)	Case No. 3:18-CR-00319-JO-07
)	
Plaintiff,)	UNOPPOSED MOTION FOR ORDER
)	AUTHORIZING DEFENSE COUNSEL TO
vs.)	FILE DECLARATION(S) IN SUPPORT OF
JOSEPH DUANE FOLKERTS,)	DEFENDANT'S MOTION TO CONTINUE
)	TRIAL DATE EX-PARTE AND UNDER
Defendant.)	SEAL.
)	

COMES NOW Defendant, Joseph Duane Folkerts, by and through his CJA-appointed attorneys, Andrew M. Kohlmetz and Laurie Bender, and hereby moves this court for an Order authorizing the Defendant's counsel to file any Declarations in support of a Motion to Continue the current trial date ex-parte and under seal. Defendant is drafting and plans to file such a Motion by the current deadline of January 22, 2020.

Counsel for Defendant so move because any such declaration(s) will necessarily reveal otherwise confidential and/or otherwise privileged information regarding both the

UNOPPOSED MOTION FOR ORDER AUTHORIZING DEFENSE COUNSEL TO FILE
DECLARATION(S)...EX-PARTE AND UNDER SEAL- 1

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defendant and the work product of defense counsel in preparation of the defense case to date.

I have spoken with AUSA Leah Bolstad and informed her of our intent to seek such an Order and she has no objection thereto.

RESPECTFULLY SUBMITTED this 21st day of January, 2020.

Andrew Kohlmetz

Andrew M. Kohlmetz, OSB #955418
Attorney for Defendant Folkerts

UNOPPOSED MOTION FOR ORDER AUTHORIZING DEFENSE COUNSEL TO FILE
DECLARATION(S)...EX-PARTE AND UNDER SEAL- 2

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